Jeanine Poltronieri
Assistant Vice President
External Affairs

AT&T Services, Inc.
1120 20th St. NW, Suite 1000
Washington, D.C. 20036
Phone 202 457-2042
Fax 202 457-2062
E-Mail: jeanine.poltronieri@att.com

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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: **Roaming Obligations of Commercial Mobile Radio Service Providers**
WT Docket No. 05-265;
In the Matter of Service Rules for the 698-746 747-762 and 777-792 MHz Bands
WT Docket No. 06-150;
In the Matter of Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band
PS Docket No. 06-229

Notice of Ex Parte Presentation

Dear Ms. Dortch:

On September 23, 2010, Joan Marsh, Jeanine Poltronieri and Joe Marx, representing AT&T, met with Charles Mathias, Legal Advisor to Commissioner Meredith Attwell Baker and Rafi Martina, Fellow to Commissioner Baker. The parties discussed spectrum policy matters generally. The parties also discussed AT&T's opposition to a mandatory data roaming requirement, consistent with AT&T's comments filed in that proceeding. AT&T pointed out marketplace developments showing that data roaming agreements are available and will only increase with the ongoing deployment of advanced technology.

AT&T also discussed the interference issues inherent in the 700 MHz band, particularly the lower A block. AT&T discussed the positions taken in ex parte letters submitted by AT&T on this issue, including that the interference concerns are not as easily addressed as the 700 MHz Block A Alliance has contended. The 3GPP adopted the standards for 700 MHz LTE Bands 12, 13, 14, and 17 based upon technical considerations surrounding anticipated operations within each 700 MHz block, and only after careful deliberation. Band 12 includes the lower A, B and C blocks. Concerns about interference with reception in the A block led to the creation of Band 17. Specifically, proximity of the A block spectrum pairs to TV broadcast transmissions in Channel 51 on the one hand, and to and high power broadcast transmissions in the unpaired 700 MHz D block and E block on the other, led Motorola to propose the adoption of Band 17, limited to the lower B and C blocks. AT&T, as well as other members of 3GPP, supported Motorola's proposal because of these valid interference concerns. As part of this discussion, we referenced the attached 700 MHz spectrum band plan.

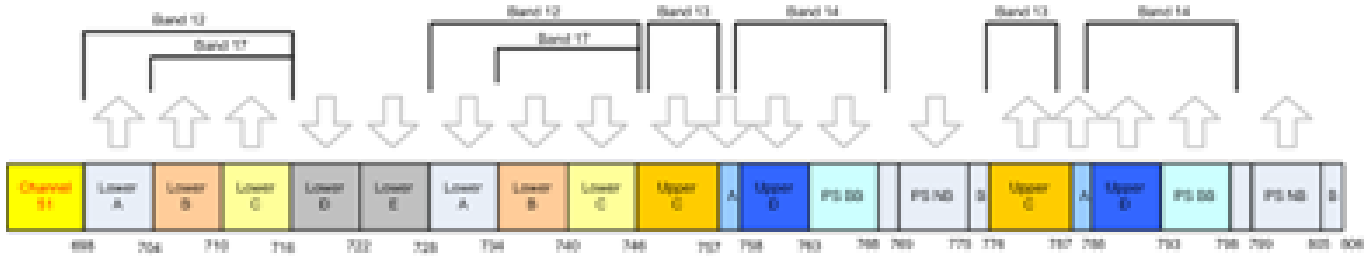
In accordance with the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record.

Sincerely,

/s/Jeanine Poltronieri

Attachment
cc: Charles Mathias
Rafi Martina

700 MHz Spectrum



The diagram above shows the 700MHz spectrum plan as defined by the FCC and the band plan as defined by 3GPP

- In the Lower 700MHz Band, there are 3 paired blocks forming the Lower A, B, and C blocks (6 + 6 MHz) and 2 unpaired blocks D &E (6 MHz)
- In the Upper 700MHz Band there are 6 paired blocks forming the Upper C (11 + 11 MHz), Upper D (5 + 5 MHz), Upper A & B (1 + 1 MHz), Public Safety Broadband (5 + 5 MHz), and Public Safety narrowband (6 + 6 MHz) plus a 1 + 1 MHz guard band between the PSBB and PSNB

The arrows show the 3GPP recommended device transmit and receive directions (duplex direction)

- Up arrows denote device transmit (Up-Link)
- Down arrows denote device receive (Down-Link)

The FCC rules for flexible use allow

- For any technology to be used in the bands that were auctioned
- Differing duplex directions from those recommended by 3GPP
- Transmission at up to 50kW ERP in Lower C, D, & E blocks

As the bands are envisioned in the Lower 700MHz band, there is

- Significant potential for interference in the Lower A band from DTV Channel 51 (operating at 1MW) and to DTVs receiving channel 51 from band A devices
- Potential interference from Lower E block (and to a lesser degree D block because of separation) that can impact devices receiving on nearby A, B, and C blocks)